

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**DOCKET NO. 04-10781NMG**

**RANDY L. HANCOCK,**  
**Plaintiff,**

**v.**

**PRINCETON PROPERTIES MANAGEMENT, INC.,**  
**d/b/a PRINCETON PROPERTIES APARTMENTS, and**  
**CHRISTIAN H. GARGUREVICH,**  
**Defendants**

**INITIAL DISCLOSURE OF THE DEFENDANT,**  
**PRINCETON PROPERTIES MANAGEMENT, INC.**

The defendant, Princeton Properties Management, Inc., pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rules 26.2(A) of the United States District Court for the District Court of Massachusetts, hereby discloses the following:

A. The defendant believes that the following individuals, in addition to those previously disclosed by the plaintiff, may have discoverable information that the defendant may use to support its claims and defenses:

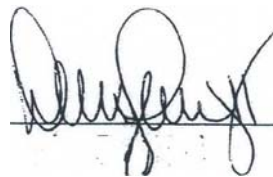
1. Roland Fong  
R & R Lawn Maintenance  
41 Nightingale Rd.  
Nashua, New Hampshire 03063  
603.889.0856
2. Lisa Parker  
Assistant Property Manager  
678 Princeton Blvd, Suite 14  
Lowell, MA 01851
3. Kurt Shillington  
c/o Princeton Properties  
678 Princeton Blvd  
Lowell, MA 01851

- B. The defendant may support its claims and defenses with the following documents, in addition to those listed by the plaintiff. Complete weather records and color copies of photographs are not yet in the possession of defense counsel. Copies of all other documents are produced to opposing counsel with this Disclosure.

**Documents**

1. Princeton Properties Management, Inc Snow Removal Contract;
2. Invoices dated 12/31/03 and 1/31/04 from R & R Lawn Maintenance;
3. Contractor Snow Removal Log dated 2/10/04;
4. General Liability Incident Report Form dated 2/11/04
5. Photographs of the subject location;
6. Weather Records for the period in question.

Respectfully submitted,  
The Defendant,  
Princeton Properties Management, Inc.,  
By its Attorney,



Denise Lauretti  
BBO# 550899  
Horn & Lauretti  
225 Friend Street, Suite 203  
Boston, MA 02114  
(617) 589-3000

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the  
above document was served upon the  
attorney(s) of record for each party  
by mail on 9 August 2004



Denise Lauretti